

**The Cheyenne Holding Corporation**  
**Beverly Sassoon International, LLC**  
**Juan C. Lopez**  
**Randolph Ross**  
**Beverly Sassoon**  
**Paul Lambert**

**Notice of Intent to Invoke Administrative Sanctions**

DATE: November 21, 2001 RESPONDENTS: Beverly Sassoon International, LLC of Los Angeles, California and Boca Raton, Florida; The Cheyenne Holding Corporation of Delray Beach, Florida; Randolph Ross of Delray Beach, Florida; Juan C. Lopez of Delray Beach, Florida; Beverly Sassoon of Boca Raton, Florida; Paul Lambert of Los Angeles, California

ALLEGATIONS: Unregistered Securities; Unregistered Broker-Dealer or Agent; Securities Fraud

It is alleged that Beverly Sassoon International, LLC ("BSI") used The Cheyenne Holding Corporation to offer and sell promissory notes in BSI. Mr. Ross, Mr. Lopez, Ms. Sassoon, and Mr. Lambert all offered and sold a promissory note to a Kansas investor.

The Commissioner alleges that respondents were not registered as broker-dealers or agents with the Kansas Securities Commissioner's office and that unregistered securities were offered and sold. Furthermore, the respondents committed fraud in the offer or sale of securities by omitting to disclose material facts to the investor. These included failing to disclose all respondents were not registered, the securities being sold were not registered and that Ms. Sassoon was the subject of an Arkansas Cease and Desist Order for offering and selling unregistered securities while not registered as broker-dealers or agents in that state.

**Notice to Investors:** If you are not a resident of Kansas and have been affected by actions that are similar to those described in this synopsis, you should consider contacting your state securities regulator for assistance. To locate your securities regulator, go to the [North American Securities Administrators Association](#) website. If you choose to contact your state securities regulator, please inform him or her of the action taken by the State of Kansas.